



February 28, 2013

**VIA ELECTRONIC COMMENT FILING SYSTEM**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: Hayes e-Government Resources, Inc,  
EB Docket No. 06-36

Dear Secretary Dortch:

Pursuant to section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. §64.2009(e), enclosed for filing in the above-referenced docket, please find the annual CPNI compliance certification of Hayes e-Government Resources, Inc.

Please direct any questions regarding this filing to the undersigned at 850-297-0551.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Brad Hood", is written over a horizontal line.

Brad Hood

**Hayes e-Government Resources, Inc.**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for calendar year 2012.

Name of company covered by this certification: Hayes e-Government Resources, Inc.

Form 499 Filer ID: 822594

Name of signatory: Karen H. Martinoff

Title of signatory: President and Chief Executive Officer

I, Karen H. Martinoff, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's") Customer Proprietary Network Information ("CPNI") rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not received any subscriber complaints concerning the unauthorized release of CPNI, nor has the Company taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers. The Company also has no knowledge or experience regarding the specific processes pretexters are using to attempt to access CPNI. The steps that the Company is taking to protect CPNI are described in the attached statement that summarizes the Company's operating procedures for compliance with the Commission's CPNI rules.

This certification is made to the best of my knowledge, information and belief.

Signed: Karen H. Martinoff

Dated: 3/1/13



**Statement of  
Hayes e-Government Resources, Inc.  
Customer Proprietary Network Information (CPNI)  
Operating Procedures**

The following statement explains the operating procedures that Hayes e-Government Resources, Inc. ("Hayes" or "Company") has established to ensure compliance with Customer Proprietary Network Information ("CPNI") rules of the Federal Communications Commission ("Commission" or "FCC").

- To the extent the Company accesses or maintains CPNI, the Company uses, discloses and permits access to CPNI: (1) for the purpose of providing a subscriber with the requested telecommunications service; to initiate, render, bill, and collect for its telecommunications services; (2) to protect the rights or property of the Company, or to protect users of those telecommunications services and other service providers from fraudulent, abusive, or unlawful use of or subscription to, such services; (3) for the purpose of providing customer premise equipment ("CPE") and protocol conversion; and (4) for the provision of inside wiring, installation, maintenance, repair services.
- Hayes does not use, disclose or permit access to CPNI for marketing services offerings outside the category/ies of service to which the subscriber already purchases from Hayes.
- Hayes does not provide any voice telecommunications services; thus, Hayes' telecommunications services do not generate any call detail information. To the extent the Company accesses or maintains CPNI, non-CDR CPNI is only provided over-the-phone to authorized contacts on the subscriber's account. The Company does not provide access to any CPNI on-line and does not have any retail locations.
- Hayes will disclose CPNI upon affirmative written request by a subscriber to any person designated by the subscriber. The Company's management is responsible for verification and approval of all affirmative written subscriber requests for CPNI.
- The Company notifies a subscriber immediately when an address of record is created or changed. This does not include the initial creation of the account. The notification is by mail to the address of record. The notification does not provide the updated information. The Company does not utilize passwords or make available any subscriber on-line accounts.
- Within 7 days of a reasonable determination of breach (*i.e.*, CPNI disclosed to a third party without subscriber authorization), Hayes will notify the US Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility [www.fcc.gov/eb/cpni](http://www.fcc.gov/eb/cpni). After 7 days of the USSS and FBI notice, if the Company has not received written direction from USSS or FBI, the Company will notify the subscriber of the breach, unless the USSS and the FBI have extend the period for such notice. For 2 years following USSS and FBI notice, the Company will maintain a record of (1) discovered breaches; (2) notifications to USSS and FBI; (3) USSS and FBI responses; (4) dates breaches discovered; (5) dates the Company notified USSS and FBI; (6) details of CPNI breached; and (7) circumstances of breaches.
- Hayes employees are trained as to the proper protection, uses and treatment of CPNI, including familiarity with the Company's internal CPNI policies and procedures. It is the policy of Hayes to employ appropriate remedies against those persons violating the Company's internal CPNI policies and procedures, including, but not limited to, financial, legal or disciplinary actions including termination and referrals to law enforcement when appropriate.